



## **Department of Toxic Substances Control**



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200

Gray Davis  
Governor

July 13, 2001

Mr. Thomas L. Macchiarella  
BRAC Environmental Coordinator  
Department of the Navy  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

**REVIEW OF THE DRAFT REVISED RISK ASSESSMENT FOR FORMER  
UNDERGROUND STORAGE SITE 957/970, DEPARTMENT OF DEFENSE HOUSING  
FACILITY, NOVATO, CALIFORNIA DATED JUNE 2001**

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the Navy's Draft Risk Assessment for the subject site, and ~~concurs with its findings~~. Please find specific suggestions from DTSC's risk assessor regarding the report enclosed.

Previously, the Navy completed a *Tier 3 Risk-Based Corrective Action (RBCA) Assessment for Former Underground Storage Tank Site 957/970, Department of Defense Housing Facility Novato, California and Adjoining Property on Hamilton Army Airfield (Batelle, November 24, 1999)* in consultation with the San Francisco Bay Regional Water Quality Control Board. A school site was proposed for location on a portion of the Navy Property by the Novato Unified School District (NUSD). DTSC is required pursuant to Section 17213 of the California Education Code, to approve the environmental review and cleanup process for the proposed acquisition and/or construction of school properties utilizing State funding. While the NUSD did not use State funding to acquire the property or make the initial improvements, the NUSD would like to be eligible for State funding in the future for additional projects. In order to be eligible, NUSD would have to complete all statutory requirements. Therefore, DTSC requested the Navy perform additional risk analysis consistent with DTSC risk models.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

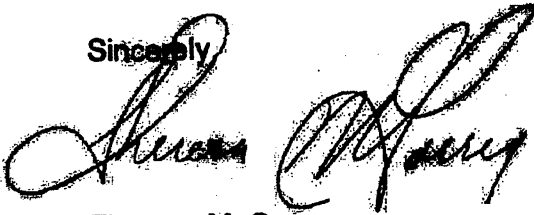
Mr. Thomas L. Macchiarella  
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When contamination remains in place greater than what is allowed for unrestricted use, or the selected remedy requires protection, institutional controls including use restrictions will be required as part of the remedy. DTSC expects the Navy to work with the BRAC Cleanup Team to identify any necessary institutional controls required to protect public health and the environment in the Corrective Action Plan for Site 957/970.

This determination is based upon the information submitted by the Navy. We expressly reserve all rights and authorities relating to information not contained in Navy documents, whether such information is known as of this date or is discovered in the future.

If you have any questions, please contact me at (916) 255-3664.

Sincerely,



Theresa McGarry  
Project Manager  
Office of Military Facilities

Enclosure

cc: Mr. Jim Davies  
Harding ESE, Inc.  
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Mr. Ken Bell  
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Mr. Ray Seid  
United States Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

**Mr. Thomas L. Macchiarella**

**July 13, 2001**

**Page 3**

**cc: Mr. James Ponton  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, #1400  
Oakland, California 94612**



Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

## Department of Toxic Substances Control

Edwin F. Lowry, Director  
2878 Camino Del Rio South, Suite 402  
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Gray Davis  
Governor

### MEMORANDUM

**TO:** Theresa McGarry  
Office of Military Facilities  
8800 Cal Center Drive  
Sacramento, CA 95826-3746

**FROM:** Michael Schum, Ph.D. *MSH for MS*  
Staff Toxicologist  
Human and Ecological Risk Division (HERD)

**DATE:** July 6, 2001

**SUBJECT:** Department of Defense Housing Facility, Novato  
Review of Revised Health Risk Assessment for Former UST Site 957/970  
PCA: 14740 Site: 200529-47

#### Background

Per your technical services request, the Human and Ecological Risk Division (HERD) has reviewed a revised health risk assessment (HRA) submitted by the Navy for the DoD Housing Facility UST Site 957/970 in Novato (DoDHS). The site has undergone substantial remediation to reduce contamination associated with gasoline from leaking underground storage tanks under the jurisdiction of San Francisco Regional Water Quality Control Board. The site borders the former Hamilton Army Airfield (HAAF), a DTSC / RWQCB joint lead site. Contaminated groundwater has migrated onto the HAAF property. This revision was prepared to address comments DTSC provided on a risk assessment submitted to the RWQCB in preparation for transfer of portions of the DoDHS property to the Novato School District and the City of Novato (memo from DTSC dated 6/25/00). The HRA also includes additional site investigation work, specifically additional soil gas sampling, recommended by DTSC in meetings held with the Navy and their contractors.

#### Document Reviewed

"Draft Revised Risk Assessment for Former Underground Storage Tank Site 957/970, Department of Defense Housing Facility, Novato, California," prepared for Naval Facilities Engineering Command, Southwest Division by Battelle, dated June 8, 2001. Received by HERD on 6/12/01.

## Comments

The Navy and Battelle have gone to great lengths to accommodate the recommendations DTSC has provided. The revision is well done and acceptable subject to the following caveats.

### Specific Comments

1. Evaluation of the indoor air exposure pathway. As requested by DTSC, the Navy conducted soil gas sampling in both the Sale and PBC Areas. This data was used as input to USEPA recommended exposure models for evaluating potential migration of volatile organic chemicals in subsurface soil to indoor air. For modeling purposes, Battelle used the soil gas data to estimate an "equivalent soil concentration" based on equilibrium partitioning between soil, soil water and soil vapor. The model calculations use this equilibrium partitioning approach to estimate the indoor air concentrations to calculate risks. The advantage to this approach vs. using concentrations in groundwater to estimate indoor air risks is that the measured soil gas term includes the total contribution to soil gas from groundwater volatilization as well as that from contaminants bound in the vadose zone soil. It should be noted that the "equivalent soil concentration" used as input to the models shown in Appendix H is not the actual soil concentration that would be measured in the field. It is an artificial term that leads to a model calculated soil gas concentration term identical to the measured soil gas concentration.

HERD recommends that the HRA include the laboratory chemical data analytical sheets. Although soil gas data is summarized in Appendix H, evaluation of indoor air risks, the raw data sheets should be included to show which chemicals were included in the list of analytes as well as the appropriate method detection limits. The HRA should contain at the very least, a complete set of analytical data sheets from the most recent sampling events in all media (soil, groundwater and soil gas).

Appendix H shows a significant increase in toluene reported in soil gas collected during sampling events last fall at off-site monitoring well MP 7/8 (adjacent to the Hamilton Meadows subdivision). Toluene was not detected at a detection limit of 0.0075 ug/l on 9/22/00. A sample collected at the same location on 12/16/00 reported a concentration of 3.54 ug/l. The table labeled "Indoor Air Risks from Toluene" in Appendix H appears to have a units conversion error for the 12/16/00 sampling date between ug/l and ppbv. Lacking the original data sheets, it is not known which value is correct, so we cannot verify the risk calculations.

2. Soil gas. Several sections of the report, including the Executive Summary, note that no BTEX (benzene, toluene, ethylbenzene, xylene) compounds have been detected in "soil or groundwater" on the HAA<sup>2</sup> portion of the groundwater plume (e.g. Hamilton Meadows). MTBE has migrated with the plume over a large area of the Hamilton

Meadows subdivision and is present in groundwater. In addition, some gasoline-related VOCs (e.g. toluene, xylene) have been detected in soil gas at two monitoring well locations near the Hamilton Meadows subdivision, although the same chemicals have apparently not been detected in groundwater in these wells. This subdivision is also bordered on the north by Landfill 26 which is known to have high concentrations of methane gas that may facilitate migration of landfill gases including possible BTEX compounds onto the Hamilton Meadows property. At this point, it cannot be determined whether the BTEX compounds detected in soil gas result from vapor migration from the DoDHS site or the landfill. Regardless of the source of contamination, the HRA evaluated potential risks at location MP 7/8 from measured soil gas for the indoor air pathway and concluded that the risks are less than  $1 \times 10^{-6}$ .

3. Excavation Worker Risks/Hazards DTSC had specifically requested that the HRA evaluate a future land use exposure scenario for a construction excavation worker, and recommended a specific exposure model developed by the USEPA for CERCLA activities. This exposure model uses a mathematical model and numerous generic assumptions about potential emission and contact rates to estimate ambient air concentrations to which workers using heavy construction equipment to excavate soil may be exposed. Using this highly conservative model, cancer risks were not considered to be a significant threat and HERD concurs. The predicted noncancer risks (Hazard Index) were well above an acceptable level of one for both the Sale and PBC Areas. HERD has examined these results in greater detail and we believe the noncancer hazard is likely less than reported, although the magnitude of the difference cannot be determined. Our conclusion is based on: 1) the exposure model is used to calculate a one-hour average air concentration using very conservative exposure factors (e.g. cubic yards of soil manipulated per day, volume of equipment loader bins, etc.); and 2) comparison to toxicity factors based on chronic, long-term exposure levels, which are typically much lower than those used to evaluate acute or subchronic health effects. It is more appropriate to compare estimated short term average concentration values to subchronic toxicity factors. This would lead to a lower estimated hazard index.

Noncancer health effects for the excavation scenario are attributed mostly to trimethylbenzene (1,2,4-TMB and 1,3,5-TMB ~90%) and to a lesser degree, naphthalene. No generally accepted regulatory toxicity factors are available for these compounds for short-term exposures for the general public. There are worker protection standards but these are not generally appropriate for risk assessment purposes. For comparison though, the exposure model predicted one-hour average outdoor air concentrations during excavation activities in the Sale Area to be  $5.3 \text{ mg/m}^3$  (1,2,4-TMB);  $2.4 \text{ mg/m}^3$  (1,3,5-TMB);  $1.87 \text{ mg/m}^3$  (naphthalene). For the PBC Area, the model predicted 2.19, 1.03 and  $0.14 \text{ mg/m}^3$ . OSHA regulated worker protection standards are  $50 \text{ mg/m}^3$  for naphthalene and  $123 \text{ mg/m}^3$  for trimethylbenzene (ACGIH TLV/TWA). Please note that HERD does not recommend that these OSHA standards be used for risk assessment purposes. They are presented here strictly as a basis for comparison. The OSHA standards apply only for industrial hygiene limits for workers in

closely regulated and monitored environments (appropriate on-site monitoring, worker protection requirements, and medical monitoring and surveillance requirements). Since there is no guarantee that these types of OSHA industrial hygiene requirements will always be enforced, HERD recommends that appropriate institutional controls be implemented to insure that construction / excavation workers are not unwillingly exposed to potentially harmful soil gas vapors

4. Noncancer indoor air risks. The HRA used the spreadsheet models developed by the USEPA for CERCLA as modified by DTSC to use CalEPA recommended cancer potency factors. The version of the spreadsheet models used by Battelle did not contain toxicity reference values for noncancer effects from benzene, and therefore the hazard index (sum of hazard quotients of individual chemicals) calculated by Battelle did not include cumulative noncancer effects from benzene. DTSC has recently modified the USEPA spreadsheets to include the CalEPA OEHHA chronic noncancer Relative Effects Levels (RELs) used for the Air Toxics Hot Spots Program. HERD has examined the spreadsheets used for this HRA, and using the maximum reported soil gas concentration (Sample location SG-16; Appendix H) determined that the HI will not be significantly affected by the inclusion of benzene (increase in HI < 0.01). Even with the inclusion of the noncancer hazards from benzene, the noncancer residential HI for the indoor air pathway is well below one in both the Sale and PBC Areas.

5. Soil Gas Monitoring. Tables 3-2 and 3-3 tables summarize the predicted indoor air risks for the Sale Area and PBC Area respectively. Cancer risks in the PBC Area are estimated to be less than  $1 \times 10^{-6}$  using the maximum reported soil gas concentration at location SG-17. Risks inside the Sale Area are estimated to be less than  $1.3 \times 10^{-5}$  for a hypothetical residential exposure scenario, or  $8 \times 10^{-6}$  for an occupational exposure scenario at location SG-16 (maximum soil gas location in Sale Area). While we agree that a commercial/industrial exposure scenario in the Sale Area is most likely, we note that risks estimated from soil gas measurements vary substantially in a short distance between monitoring locations bordering the boundary of the Sale and PBC area. The Navy has indicated that the higher risks calculated for the Sale property can be attributed more to soil gas emanating from benzene bound in vadose zone soil rather than emissions from groundwater. This interpretation is based in part on the observation that the maximum measured soil gas concentrations generally do not occur at the locations of maximum groundwater concentrations. It is our understanding that the RWQCB intends to continue to monitor groundwater concentrations on both the Sale and PBC Areas. We also note that groundwater concentrations in the vicinity of SG-16 and SG-17 have decreased substantially over time. We recommend that the RWQCB also continue to monitor soil gas profiles at these locations to assist in evaluating if the decrease in groundwater concentrations is related to biodegradation vs. dilution related to migration of contaminants in the groundwater plume. If biodegradation is the primary process of removal as suggested by the Navy and Battelle, we would expect the soil gas concentrations to decrease significantly over time. If groundwater concentrations continue to decrease with little change in soil gas

concentrations, it would suggest that biodegradation may not be as significant as hypothesized. This may impact future decisions on development primarily in the Sale Area if a reservoir of soil-bound contaminants is to be left in place.

## Summary

The methodology and risk calculations and overall risk assessment report is generally acceptable for release to the public, but we suggest that an additional appendix be made available for public review as soon as possible to accompany the HRA showing the actual laboratory data reports. HERD believes that the HRA would benefit greatly by including the analytical data sheets for the most recent sampling events for groundwater, soil gas and bulk soil measurements. Much of this data is already included in the Figures in the HRA and other reports submitted to the RWQCB. We feel it is useful to provide the original results (laboratory data sheets) for the most recent sampling events in the HRA report as well, showing which chemicals were analyzed for but not detected in the different media, as well as method detection limits.

For risk management purposes, Regional personnel should evaluate the following limitations on the risk assessment.

1. Groundwater Exposure Pathways. The HRA did not estimate health risks from potential ingestion of groundwater or residential use of groundwater (showering, gardening, swimming pools, etc). If the Regional Water Board has determined that the contaminated groundwater under the site will not be pumped and used for these purposes by whatever regulatory restrictions they have the authority to impose, HERD concurs that this pathway need not be evaluated for potential health risks
2. Ecological Assessment. Numerous concerns have been raised in the community about the potential for site-related contaminants to migrate off-site into Pacheco Creek on the HAAF property. The HRA prepared by Battelle evaluates only potential human health exposures on the Navy property (Sale and PBC Areas) from exposures by inhalation or direct soil contact. The HRA should not be used to make any decisions regarding potential ecological impacts from off-site migration of contaminated groundwater.
3. Secondary Exposure Pathways. The HRA did not evaluate potential secondary exposure pathways (e.g. consumption of food items grown in contaminated media) that might occur in a residential exposure scenario. Some concerns were raised about this possibility at a recent Restoration Advisory Board meeting. HERD feels that the risks from this pathway are negligible since: 1) volatile organic chemicals such as benzene, MTBE and toluene have not been shown to bioaccumulate in the types of garden crops which could potentially be grown in the PBC Area; and 2) uptake of these types of highly volatile chemicals by plants from groundwater would be rapidly lost by photosynthetic plants by the process of transpiration / evaporation to the atmosphere.



Theresa McGarry

07/10/01

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4. ~~Invasive Construction Worker~~ As noted above, the HRA did evaluate potential inhalation exposures for future excavation / construction workers in the Sale and PBC Areas. The HRA concluded that there could be a potential noncancer health threat for this scenario. As such, the HRA should not be interpreted to mean that no land use restrictions are necessary. Although future occupational type exposures may be monitored and/or controlled by regulatory industrial hygiene requirements, it has been HERD's experience that these requirements are not always met in real life situations, especially for short-term invasive earth moving type of construction activities. Some type of enforceable institutional controls need to be included in a final risk management decision before any property transfers take place between the Navy and/or the City of Novato and the Novato School District.

The comments we have provided are meant to be constructive and we hope they are useful. If you have any questions please call me at (619) 278-3743 or the Human and Ecological Risk Division at (916) 255-6640.

Reviewed by: Michael Wade, Ph.D. *MTW*  
Senior Toxicologist

Cc: Charles Miller, DVM, Ph.D.  
Senior Toxicologist



William H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## San Francisco Bay Region

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Gray Davis  
Governor

December 18, 2001  
File No. 2159.5008 (JDP)

Mr. Thomas L. Macchiarella, Jr.  
Naval Facilities Engineering Command  
- Southwest Division  
1220 Pacific Highway  
San Diego, California 95132-5190

**SUBJECT: Draft Corrective Action Plan for Groundwater at the Former Underground Storage Tank Site 957/970, Department of Defense Housing Facility, Novato, California**

Dear Mr. Macchiarella, Jr.:

Regional Board staff have reviewed the following documents and correspondence:

- The Draft Proposed Final, Revision 1.0, Corrective Action Plan (CAP) for Groundwater for the Former Underground Storage Tank Site 957/970, Department of Defense Housing Facility, Novato, California, dated August 2001;
- The Department of Navy's General Responses to October 16, 2001 Regional Board Comments on the Draft Proposed Final Revision 1.0, Corrective Action Plan for Former Underground Storage Tank Site 957/970, dated November 30, 2001; and,
- Revisions to Figure 7-1 (Conceptual Diagram for Biosparging at Former UST Site 957/970 and Figure 7-6 (Estimated MTBE Concentration Trends in Performance Goal Monitoring Wells Resulting from Biosparging Operation, received from the Department of Navy via email on December 6, 2001 and December 5, 2001, respectively.

In light of the information provided, Regional Board staff conditionally approve the installation and operation of the proposed biosparging system provided the Department of Navy's acceptance of, and successful completion of, the following conditions and tasks:

1. Time Schedule: As required by SCR Order No. 00-064 Task 6.b.6, the Department of Navy shall provide the Regional Board with a Time Schedule for implementation of the recommended alternative. The Time Schedule shall follow the tasks described on Table 7-4 of the CAP. Public review, finalization of the CAP to include all responses to comments, and system design and installation shall be completed no later than June 30, 2002.

**California Environmental Protection Agency**

2. Phase 1 Biosparging System Design: Phase 1 system design will be expanded parallel to State Access Road and Dead End Road as shown on the revised Figure 7-1 dated December 6, 2001 (attached). The number of Phase 1 sparge wells will not be less than the 48 sparge wells depicted on revised Figure 7-1.
3. Phase 2 Biosparging System Augmentation: Although the CAP proposes installing an additional 10 sparge wells during Phase 2 of the proposed biosparging remedy, Regional Board staff recognize that the actual number and physical placement of additional sparge wells will be based on the effectiveness of the Phase 1 design in containing and remediating the hydrocarbon plume. RWQCB staff will review the performance data collected from the Phase 1 wells, and at the request of the Regional Board, the Department of Navy shall install additional sparge wells and/or monitoring wells as deemed necessary by Regional Board staff.
4. Biosparging System Performance Monitoring Well Locations: The number and locations of the proposed performance monitoring wells will be expanded as depicted on revised Figure 7-1, dated December 6, 2001 (attached)
5. Biosparging System Performance Monitoring Goals: Figure 7-6 depicts estimated MTBE concentration trends in performance monitoring wells resulting from biosparging and monitored natural attenuation. Although Figure 7-6 predicts that active remediation will take about 18 months and result in a 95% to 99% decrease in groundwater concentrations assuming an initial concentration of 30,000 parts per billion MTBE, Regional Board staff recognize the actual remedial performance may vary from what is predicted.

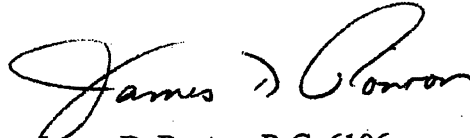
Therefore, the RWQCB requires that the performance data collected from each sparge point and each performance monitoring well coupled with concentration trends exhibited by the existing property boundary monitoring wells (i.e., MW-M10, MW-M9, and MW-M8), located downgradient of the remediation system, be evaluated against the performance goals depicted on Figure 7-6.

The Regional Board will determine and approve when the biosparging system can be converted to cyclic sparging or discontinued entirely based on a review of concentration trends from the sparge wells, performance wells and boundary wells. Should the proposed sparge system not operate as described, the Regional Board will require changes to the system.

Regional Board staff requires that the Navy submit quarterly reports during and following the active phase of remediation documenting the concentration trends exhibited by the wells described above. By corollary, should the monitored natural attenuation component of the remedy for both the offsite and onsite portions of the plume not perform as predicted and described in the CAP, Regional Board staff may require augmentation of the proposed remedy.

The Department of Navy is requested to provide Regional Board staff with a written response by January 7, 2002 accepting the above conditions prior to submitting a Final CAP.

Sincerely,

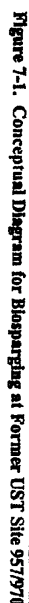


James D. Ponton, R.G. 6106  
Associate Engineering Geologist  
San Francisco Bay - Regional Water Quality  
Control Board

Attachment: Draft Figure7-1 (Conceptual Diagram for Biosparging), dated 12/6/01

cc: Theresa McGarry  
Department of Toxic Substances Control, Office of Military Facilities  
8800 Cal Center Drive  
Sacramento, CA 95826

Raymond Seid  
RPM, Hamilton Army Airfield  
US Environmental Protection Agency  
Federal Facilities Cleanup Branch (SFD-8-3)  
75 Hawthorne Street,  
San Francisco, CA 94105-3901



**Conceptual Plan View of Bio Sparging/Air Sparging Configuration at Former UST Site 957/970**



**Conceptual Diagram of Profile View for Bio Sparging/Air Sparging Configuration at Former UST Site 957/970**

Cal/EPA

December 8, 1997

Department of  
Toxic Substances  
Control

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Mr. Larry Lind  
Base Realignment and Closure Environmental Coordinator  
Engineering Field Activity, West  
Naval Facilities Engineering Command  
900 Commodore Way, Building 2908  
San Bruno, California 94066-5006

Pete Wilson  
Governor

Peter M. Rooney  
Secretary for  
Environmental  
Protection

NO FURTHER ACTION, DEPARTMENT OF DEFENSE HOUSING FACILITY  
(DODHF), NOVATO, CALIFORNIA

Dear Mr. Lind:

The Department of Toxic Substances Control (DTSC) in coordination with the San Francisco Bay Regional Water Quality Control Board (RWQCB) has reviewed the following documents in support of the environmental condition of property at DODHF:

DTSC Community Environmental Response Facilitation Act  
Concurrence Letter dated December 8, 1997,

San Francisco Bay RWQCB letter dated November 17, 1997,

Department of the Navy letters dated July 30, 1997,  
August 20, 1997 and October 8, 1997,

Final Environmental Baseline Survey Follow-up Sampling  
Addendum Report dated August 4, 1997,

Final Phase 1 Supplemental Environmental Baseline  
Survey (FSEBS) dated April 21, 1997,

Field Summary Report Storm Drain Cleanout and Sediment  
Removal, dated July 1997.

Mr. Larry Lind  
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DTSC Soil Analysis Results dated April 14, 1997,

DTSC Inspection Results dated April 30, 1997 and  
June 14, 1997,

Basewide Environmental Baseline Survey dated  
October 19, 1995.

Based on the above documents, limited visual inspections and pursuant to the California Health and Safety Code, Division 20, Chapter 6.8, DTSC, as the State's lead regulatory agency, has determined that the parcels specified below and delineated in the FSEBS dated April 21, 1997 do not require further action with regard to petroleum products and hazardous substances:

Parcels: 8, 16, 64, 9, 12, 54, 104

DTSC further finds that no further action is necessary with regards to hazardous substances for the parcels listed below. However, the Navy is currently completing the investigation and remediation of petroleum releases for these parcels which is exempt under Comprehensive Environmental Response, Compensation, and Liability Act, but regulated by the San Francisco Bay RWQCB pursuant to the California Code of Regulations, Division 3, Chapter 16.

Parcels: 28, 29

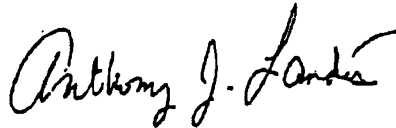
Additionally, DTSC's No Further Action does not apply to Parcels 21 and 22 due to the potential release of lead-based paint to the environment, and Parcel 15 due to potential impacts from the ground water plume.

Should additional information be provided regarding a release or threatened release of petroleum products or hazardous substances, further investigation or remediation may be required.

Mr. Larry Lind  
December 8, 1997  
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If you have any questions or comments, please do not hesitate to contact me at (916) 255-3565. Your staff may contact Ms. Theresa McGarry, Environmental Assessment and Reuse Specialist at (916) 255-3664 or Mr. Ray Leclerc, Project Manager, at (916) 255-3668.

Sincerely,



Anthony J. Landis, P.E.  
Chief,  
Northern California Operations  
Office of Military Facilities

cc: Mr. John Corpus  
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